A. David Youssefyeh (185994) A D Y Law Group, P.C. 1925 Century Park East, Suite 1380 Los Angeles, California 90067 1 FILED CLERK, U.S. DISTRICT COURT 2 (310) 772-2872 (310) 772-0020 Telephone: 3 December 22, 2017 Facsimile: 4 CENTRAL DISTRICT OF CALIFORNIA BY: Karla Tunis DEPUTY Attorneys for Defendant, TIMOTHY MCDONALÓ 5 6 7 UNITED STATES DISTRICT COURT 8 CENTRAL DISTRICT OF CALIFORNIA 9 10 Case No. 8:17-CR-00066-JVS UNITED STATES OF AMERICA, 11 **DEFENDANT TIMOTHY MCDONALD'S** 12 Plaintiff, EX PARTE APPLICATION TO FILE 13 INITIAL POSITION RE SENTENCING vs. **UNDER SEAL** 14 TIMOTHY MCDONALD, 15 16 Defendants. 17 18 19 20 21 22 23 24 25 26 27 28 -1-

Defendant Timothy McDonald hereby submits this Application to request that the court allow him to file his Initial Position re Sentencing under seal. DATED: December 21, 2017 Respectfully submitted, A | D | Y LAW GROUP, P.C. By: A. David Youssefyeh Attorneys for Defendant, TIMOTHY MCDONALD -2

## **DECLARATION OF A. DAVID YOUSSEFYEH**

I, A. David Youssefyeh, hereby declare:

- 1. I am above the age of eighteen and a member of the bar for the U.S. District Court for the Central District of California. I am the counsel for the defendant herein, Timothy McDonald. The facts noted herein are of my own personal knowledge if I were asked to testify I could competently testify to the same.
- 2. Defendant would like to file his Initial Position re Sentencing under seal as it contains personal information about him which he does not wish to be made public.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 21, 2017 at Los Angeles, California.

A. David Youssefyeh